

JOINT STATUS REPORT

Pursuant to the applicable Scheduling Order, Counsel for the defendant and Counsel for the Government inform the Court as follows:

- ☐ A plea agreement has been signed and filed
- ☐ The parties have agreed on a plea agreement and a written plea agreement will be filed no later than _____.
- ☐ The defendant intends to plead guilty without a written plea agreement.

If any of the above three boxes is checked, check at least one box below:

- ☐ the defendant consents to a video conference Rule 11 hearing.
- ☐ the defendant consents to a teleconference Rule 11 hearing.
- ☐ the defendant is or will be ready to proceed with a Rule 11 hearing as soon as an in-person hearing can be scheduled.
- ☒ The matter is not ready for Rule 11 hearing or trial because:
 - ☐ there is a pending motion which must be resolved. The motion is on the docket at Doc. _____. The motion ☐ does ☐ does not require a hearing at which the defendant must be present.
 - ☐ There are outstanding discovery issues which must be resolved
 - ☒ Plea negotiations and execution are ongoing but are expected to be resolved shortly.
- ☐ The defendant does not intend to plead guilty and the case needs to be set for jury trial. [For trials, fill in the following]

Scheduling limitations or issues, if any:

Trial time estimate: _____ days (from beginning jury selection to submission to the jury)

[X] The parties have discussed the requirements of the Speedy Trial Act and

[] The Government [] has filed [] intends to file a motion to exclude time from Speedy Trial Act calculations, to which the defendant [] does not object [] expects to object.

[X] There are no Speedy Trial Act issues unless the expected Rule 11 hearing cannot be completed before November 6, 2020.

[] _____

[] Other information relevant to scheduling: _____

[] If either party expects to file a motion to continue,

[] If the parties agree a continuance is appropriate, a motion to continue [] has been filed [] will be filed which explains the reasons for the continuance and a scheduling or case management plan is provided [] in the motion [] as an attachment to this report.

[] A contested motion to continue [] has been [] will be filed by [] The Government [] The defendant

This 1st day of October, 2020.

/s/ Andrew Farris
Name
Counsel for the Defendant

/s/ Matthew G.T. Martin
Name
Counsel for the Government